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March 21, 2018

BY ECF

The Honorable Katharine H. Parker
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

City of Almaty, et al. v. Ablyazov (15-cv-05345-AJN-KHP)
Subpoena to Produce Documents dated February 24, 2017
directed to Wells Fargo Bank, N.A. (the “Subpoena”)

Dear Judge Parker:

We are counsel to non-party Wells Fargo Bank, N.A. (the “Bank”), which was served with the referenced Subpoena. Additionally, we received this Court’s February 28, 2018 Decision and Order (the “Order” Dkt. No. 560). The Order, *inter alia*, directed Plaintiffs to “identify specific additional entities,” and that the Bank shall “unredact bank records, if any, concerning those entities as it similarly did in response to the Courts [sic] May 5, 2017 Order.” In accordance with the Order, and based on the date Plaintiffs’ counsel provided us with the list of entities, the Bank’s reproduction with revised redactions is due on March 27, 2018.

On March 16, 2018, we received the Petelins’ letter motion (Dkt. No. 571), which essentially seeks to narrow the list of entities Plaintiffs provided to the Bank. Later that day, I spoke with Daniel Boyle, counsel to Plaintiffs. I requested that the Bank’s time to make any required additional production be tolled pending the resolution of the Petelins’ motion in order to avoid unnecessary costs and that the Bank be granted a reasonable extension based in part on travel and religious schedules. He agreed.

Thus, we respectfully request that the Court toll the Bank’s time to make any additional production in response to the Order pending determination of the Petelins’ letter motion and that it extend the Bank’s time to make said production until

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three (3) weeks from the time a list certain is provided to the Bank. This is the first time the Bank is seeking an extension of time from the Court.

We appreciate the Court's courtesy in connection with this request.

Respectfully submitted,

/s/ Kenneth C. Rudd

Kenneth C. Rudd

KCR:TDV:dct

cc: All Counsel (by ECF)